

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20054

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of 73.202(b)) MM Docket No. 98-159
Table of Allotments)
FM Broadcast Stations)
(Wallace, ID and Bigfork, MT))

To: Nancy Joyner
Allocations Branch

REPLY COMMENTS IN OPPOSITION

Pursuant to 47 CFR 1.420, Bee Broadcasting, Inc. ("BBI") respectfully submits these Reply Comments in opposition to the referenced Rule Making proceeding, which proposes to amend the FM Table of Allotments by reallocating channel 264C from Wallace, Idaho to Bigfork, Montana and to modify the permit of unbuilt station KSIL (FM) accordingly.

Summary of Argument

Petitioner has (i) failed to carry its burden of proving that "Bigfork" is an appropriate "community" for allotment purposes, (ii) failed to respond properly to the NPRM's request for a gain/loss study and (iii) failed to prove that the public interest would be served by the reallocation of channel 264C from Wallace, Idaho to Bigfork, Montana.

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DISCUSSION

I. THE PUBLIC INTEREST WOULD NOT BE SERVED BY THE PROPOSED REALLOTMENT FROM AN "UNDERSERVED AREA" OF IDAHO TO MONTANA

1. Petitioner proposes to move its unbuilt Class C radio station -- KSIL (FM) -- from Wallace, Idaho, almost 100 miles away, to Bigfork, Montana. In its Comments (at 6), Petitioner argues that the public interest would be served by the reallocation of FM Channel 264C because Bigfork, Montana would thereby receive a "first" local broadcast transmission service. Even assuming arguendo that "Bigfork" is an appropriate "community" for FM allotment purposes under FCC precedent, such a reallocation would be demonstrably NOT in the public interest.

2. It long has been the FCC's highest FM allocation priority to provide underserved areas and populations with new FM service. See Revision of FM Assignment Policies & Procedures, 90 FCC 2d 87,92 (1988). Within that high priority, the FCC has elevated to near "determinative" allocation status the provision of "first" fulltime broadcast service to "white" areas and populations (those without existing fulltime service). Id., 90 FCC 2d at 90, note 3. These sound FCC policies reflect the FCC's appropriate implementation of its statutory mandate under Section 307(b) of the Communications Act, 47 USC 307(b).

3. Petitioner's proposal in this case to abandon significant "white" area service in Idaho for an area in Montana that is

far better served is manifestly not in the public interest. As BBI has argued in its Comments, ^{1/} Petitioner's proposal to abandon its proposed service to Wallace, Idaho would deprive approximately 1500 persons of a "first" fulltime ("white area") FM service. See Exhibit E-1, Engineering Statement at 2, Exhibit E-2 and Exhibit E-3. ^{2/} By contrast, its proposal to reallocate channel 264C to Bigfork, Montana would result in NO (zero) first broadcast service (NO WHITE AREA). Id.

4. Moreover, Petitioner's proposal to abandon its service in Idaho also would result in the loss of "gray area" service ^{3/} to over 2,000 persons. See Exhibit E-1, Engineering Statement at 2. By contrast, its proposal to reallocate channel 264C to Bigfork, Montana would result in new "gray area" service to only ten (10) persons. Id.

5. Indeed, contrary to the claims in its Comments, Petitioner's proposal to reallocate channel 264C to Bigfork would deprive new aural service to over 12,000 (Twelve Thousand) persons who are currently "underserved" within the "loss" area of the authorized KSIL (FM) service contour. Id. By contrast, the proposed Bigfork facility would provide new service to only about

^{1/} See Comments in Opposition, filed October 26, 1998, at 2-3.

^{2/} Moreover, if Petitioner were to change its community of license to Kellogg, Idaho -- as suggested in BBI's Comments -- Petitioner's new service would provide not only a first "local" transmission service BUT ALSO new "white area" service to approximately 1637 persons. See BBI's Comments, supra at 2.

^{3/} Populations in "gray areas" receive only one (1) fulltime broadcast service.

2,000 persons who are underserved by fewer than five fulltime aural broadcast services. Id.

6. In sum, this is not even a close case. Under clear FCC precedents and its statutory mandate to provide at least some (i.e., one) aural broadcast service to all of the citizens of the United States, Petitioner's proposal to abandon service to substantial "white" and "gray" area populations in Idaho is manifestly contrary to the public interest.

II. PETITIONER FAILED PROPERLY TO SHOW "GAIN/LOSS" DATA

7. In the NPRM, Petitioner was requested to provide information in its Comments "reflecting the areas and population that will receive new service, as well as the areas and population that will lose potential service if channel 264C is reallocated to Bigfork." Id. at para. 6. In its Comments, Petitioner submitted an Engineering Study that was not fully responsive to the FCC's request.

8. First, Petitioner's Engineering Statement erroneously contended that there would "in reality" be no "loss" area because KSIL (FM) had not been built. See Petitioner's Comments at Exhibit 11, page 1. The NPRM itself recognizes that there would be "loss" area if KSIL (FM) were moved nearly 100 miles to Montana. Id. at para. 6.

9. Second, Petitioner's Engineering Statement also erroneously contended that, by allocating KSIL (FM) to "Big Fork"

[sic?], there would be a total "gain" in population of 83,067 persons. As BBI's engineering consultant has correctly determined, however, that is based on a miscalculation of the total population within the proposed Bigfork, Montana 60 dBu service contour.^{4/} See Exhibit E-1 at 1. Based on a full Class C facility operating at Petitioner's stated referenced coordinates for the proposed channel 264C allotment at Bigfork, the true service area population is only 83,961. Id. Thus, rather than a population "gain," there would in fact be a population "loss" of over 38% -- 51,585 persons -- if Petitioner's reallocation were granted.

III. "BIGFORK" IS NOT AN APPROPRIATE COMMUNITY FOR ALLOTMENT PURPOSES

10. Petitioner was assigned the burden by the NPRM to prove that "Bigfork" is an appropriate "community" for FM allotment purposes. NPRM at para 5. It has failed to prove that Bigfork has enough "indicia of a community" to warrant the extreme reallocation requested (moving the CP almost 100 miles, from Idaho to Montana).

11. First, Petitioner's "new" population figure for Bigfork of "1,461" is admittedly in conflict with its previous claim of

^{4/} Petitioner's estimate of the total population within KSIL (FM)'s currently authorized 60 dBu service contour (137,068) corresponds closely with BBI's (135,546). Id.

"1,100." ^{5/} In point of fact, there can be no clear population figure for Bigfork since it has no identifiable boundaries. ^{6/} Indeed, there does not even appear to be a consistent way to spell the name, as Petitioner's own engineer repeatedly refers to the community of "Big Fork" in his Comments. ^{7/}

Second, the enrollment figures for the "Bigfork Public School System" are unreliable because that system serves students who reside in towns and areas that are totally unconnected to Bigfork. ^{8/}

Third, it is not even clear in what "county" Bigfork is actually located. Although Petitioner states that its latest "Bigfork" population data comes from the U.S. Census designation of an area within "Flathead County," ^{9/} there is other evidence that the "Bigfork school district" includes part of Lake County, Montana. ^{10/}

Finally, while there is no question that the name "Bigfork" is associated with seasonal arts events in Flathead County during

^{5/} Petitioner acknowledges that the 1,100 figure was "rounded up" from a figure obtained from Rand McNally. See Petitioner's Comments, at 2-3.

^{6/} See BBI's Comments, supra, Appendix A at 3.

^{7/} See Petitioner's Comments at Exhibit 11, page 1, at Figure 1, and at Figure 3.

^{8/} See The Daily Inter Lake newspaper, Wednesday November 4, 1998, at 1, 3 ("The Bigfork school district also includes part of Lake County, where the [bond] issue failed...")

^{9/} See Petitioner's Comments, supra, at 2.

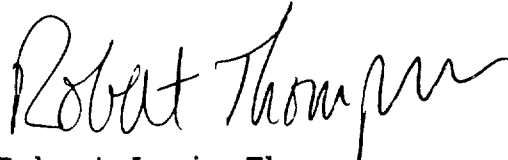
^{10/} See The Daily Inter Lake newspaper, Wednesday, November 4, 1998, at 1.

one three-day weekend of the year, that hardly establishes "Bigfork" as a "community" needing a Class C fulltime radio station anymore than Robert Redford's "Sundance" film festival held one week each year in the small "community" of Sundance, Utah obliges the FCC to allocate a Class C fulltime radio station to that once-a-year arts "community." ^{11/}

CONCLUSION

In view of the foregoing, the proposed reallocation of channel 264C from Idaho to Bigfork, Montana should be DENIED.

Respectfully submitted,



Robert Lewis Thompson
TAYLOR THIEMANN & AITKEN, L.C.
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Alexandria, VA 22314
(703) 836-9400

Counsel for BBI

November 9, 1998

cc: Ted Kramer, Esq. (Counsel for Petitioner)
Nancy Joyner, Room 500, 2000 M St, NW, Washington, DC 20036

^{11/} There is no radio station allocated to Sundance, UT.

**ENGINEERING EXHIBITS
IN SUPPORT OF
REPLY COMMENTS
REGARDING NOTICE OF
PROPOSED RULE MAKING**

November 5, 1998

Bee Broadcasting, Inc.
FM Channel 264C □ 100.7 Megahertz
Bigfork, Montana
Wallace, Idaho
Kellogg, Idaho
MM Docket No. 98-159



LAWRENCE L. MORTON ASSOCIATES
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HOLLYWOOD HILLS, CALIFORNIA 90068-1901
(323) 467-5010 / FAX (323) 467-5848

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E-3	Map Showing Service Area From Authorized KSIL(FM) Facility at Wallace and Contours of Other Aural Broadcast Services
E-4	Maps Showing Areas That Receive Service From Other Aural Broadcast Services Within Authorized Service Area of KSIL(FM) at Wallace
E-5	Tabulation of Other Aural Broadcast Services Within Proposed Loss Area of KSIL(FM) at Wallace
E-6	Tabulation of AM and FM Broadcast Stations Providing Aural Services Within Proposed Loss Area of KSIL(FM) at Wallace

EXHIBIT E-1 ENGINEERING STATEMENT

The information and data contained within these engineering exhibits were prepared on behalf of Bee Broadcasting, Inc. ("Bee"), in support of reply comments to *Notice of Proposed Rule Making*, MM Docket No. 98-159, RM-9290, released September 4, 1998.

I. DISCUSSION

The petitioner stated in its comments that the total population within the service contour of the Bigfork facility is 133,798 persons. This figure does not represent the true population within the Bigfork 60 dB μ service contour and is well in excess of the actual figure of 83,961 persons. This is based on a full Class C facility (100-kW ERP and 600-meter HAAT) operating at the petitioner's stated reference coordinates for the proposed Channel 264C allotment.

The population within the KSIL(FM) authorized 60 dB μ service contour at Wallace is 135,546 persons, which agrees closely with the 137,068 persons stated by the petitioner. The 1990 U.S. Census population within the area common to both contours is 973 persons. This area is shown in yellow in exhibit E-2. There would be a loss of service area population of some 51,585 persons by the move of KSIL(FM) from Wallace to Bigfork. This is equal to over 38% of the population within the KSIL(FM) authorized service contour.

II. SECTION 307(b) STUDY

Exhibit E-2 is a map showing the KSIL(FM) authorized contour at Wallace and the contour from a full Class C facility at Bigfork. In yellow is the portion of the area within the contours that will be served by either facility.

A study was conducted to determine the number of AM and FM stations that provide full-time aural broadcast service to the proposed loss area within the KSIL(FM) authorized 60 dB μ service contour at Wallace. The loss area is defined to be that region within the KSIL(FM) contour that will not be served by the proposed Class C facility at Bigfork.

Pursuant to established Commission policy, full-time AM reception service is defined by the station's nighttime interference-free contour for non-Class A stations, and by the 0.5 mV/m groundwave contour for Class A stations. Nighttime interference studies were performed for all

full-time AM facilities within the vicinity of the area under study to determine those AM stations that provide nighttime interference-free service within the KSIL(FM) proposed loss area.

Also studied were the 60 dB μ contours of all FM stations in the area to determine those that provide service to portions of the KSIL(FM) proposed loss area. For non-Class C FM stations operating at less than maximum facilities, technical parameters were based on maximum facilities for the class of station under study. In the case of Class C stations, either the actual operating parameters or a minimum 300-meter height above average terrain and 100-kW effective radiated power was assumed, whichever is greater. Exhibit E-6 is a tabulation of the stations that provide full-time aural broadcast reception within the KSIL(FM) proposed loss area.

Exhibit E-3 is a "spaghetti" map depicting the KSIL(FM) authorized 60 dB μ service contour and the contours of all AM and FM stations that provide full-time aural service within the KSIL(FM) proposed loss area. Exhibits E-4A through E-4F are a series of maps showing the service contour of KSIL(FM), and the service contours of the existing full-time aural services within the loss area portion of the KSIL(FM) contour. Blue shading is used to represent the areas that receive a specific number of full-time aural broadcast services corresponding to the number indicated in the title block of the map. Exhibit E-5 tabulates these data and indicates the land areas and populations within the identified regions.

There is a 1990 U.S. Census population of 1,553 persons within the *white area* and 2,705 persons within the *gray area* of the proposed loss area of KSIL(FM). Thus, the proposed move of KSIL(FM) from Wallace to Bigfork would deprive 4,258 persons within the *white* and *gray areas* from the service that KSIL(FM) was authorized to provide. Furthermore, 12,543 persons within the loss area portion of the authorized KSIL(FM) service contour are underserved, according to the Commission's definition of fewer than five aural services.

In contrast, there is no *white area* population and only 10 persons within the *gray area* that will be served by the proposed Channel 264C allotment at Bigfork. The proposed Bigfork facility would provide service to 2,341 persons that are now underserved by fewer than five aural broadcast services.

III. METHODS

For each FM station presented in these exhibits, terrain elevation data from three to sixteen kilometers on radials spaced at one-degree azimuthal intervals, starting with True North, were extracted from the computerized thirty-second point elevation database version of *Elevation Data for North America*, available from the Department of Commerce, National Geophysical Data Center, National Oceanic and Atmospheric Administration. A total of 161 points along each radial were linearly interpolated according to § 73.312(d). The height above average terrain along each of the 360 radials was computed by averaging the elevations between three and sixteen kilometers below the antenna radiation center in accordance with § 73.313(d)(3).

The locations of the 60 dB μ F(50,50) service contours were calculated according to the computer methods outlined in F.C.C. publication PB-249144, *Field Strength Calculations for TV And FM Broadcasting*. These computer methods use digitized data taken directly from the graph of § 73.333 Figure 1. Intermediate values are obtained using bivariate interpolation techniques for surface fitting.

Technical data for AM broadcast stations were obtained from the latest version of the FCC AM Engineering Database. Soil conductivities used in the determination of distances to the nighttime interference-free contours were derived from the computerized FCC M-3 soil conductivity database. Conductivity data were extracted for every one degree of azimuth.

For stations employing directional antenna systems, the Standard Radiation using the theoretical operating parameters contained within the AM Engineering Database was computed and used for inverse field strength. In the case of nondirectional stations, the effective field strengths at one kilometer were employed.

In accordance with § 73.183(e), the "equivalent-distance" (Kirke) method was used to determine the distances to the nighttime interference-free contours where more than one conductivity zone exists over the path length.

Population figures for the areas within the contours were obtained through use of the computerized *1990 Census of Population and Housing Public Law 94-171 Data* made available by the U.S. Department of Commerce, Bureau of the Census. The census counts were taken down to the block level for maximum accuracy and resolution. There are approximately seven million block level records in the database. When the centroid coordinates of a census block fell within the contour the entire population associated with the block was assumed to reside within the contour. When the centroid fell outside the contour no portion of the population was counted.

The areas within the contours were computed using numerical integration employing the computed distances to the contours for each degree of azimuth. Distances to contours along intermediate azimuths were obtained mathematically by piecewise third-order polynomial approximations.

IV. CONCLUSIONS

In conclusion, the following additional facts are presented to those already submitted in the comments. The reallocation of Channel 264C from Wallace, Idaho to Bigfork, Montana will:

- Provide a second aural service to 10 persons and a new aural service to 2,341 persons that are now underserved.

- Provide a third service to 320 persons, a fourth service to 287 persons, and a fifth service to 1,724 persons.
- Deprive 1,553 persons within the *white area* and 2,705 persons within the *gray area* of the service that was to be provided by KSIL(FM) at Wallace.
- Deprive a third service to 990 persons, a fourth service to 6,779 persons, and a fifth service to 5,166 persons living within the proposed KSIL(FM) loss area.
- Serve 83,961 persons within the 60 dB μ service contour against the 135,546 persons living within the KSIL(FM) authorized service contour at Wallace.

Lawrence L. Morton, P.E.
Consulting Engineer to Bee Broadcasting, Inc.
November 5, 1998



AFFIDAVIT

State of California)
) ss:
County of Los Angeles)

Lawrence L. Morton, being first duly sworn upon oath, deposes and says:

- That he is a qualified engineer,
- That he is a Registered Professional Engineer in the State of California,
- That he is a member of the Association of Federal Communications Consulting Engineers,
- That his qualifications are a matter of record with the Federal Communications Commission,
- That he has prepared many broadcast applications and engineering exhibits that have been filed with and granted by the Federal Communications Commission,
- That he has carried out such engineering work and that the results thereof are attached hereto and form part of this affidavit, and
- That the foregoing statement and the report regarding the aforementioned engineering work are true and correct of his own knowledge.


Date: November 5, 1998



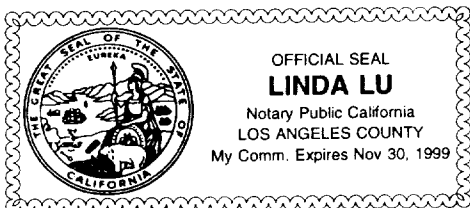
Lawrence L. Morton, P.E.

On November 5, 1998, before me, Linda Lu, a Notary Public, in and for the State of California, personally appeared Lawrence L. Morton known to me to be the person whose name is subscribed to the within instrument, and acknowledged to me that he executed the same.

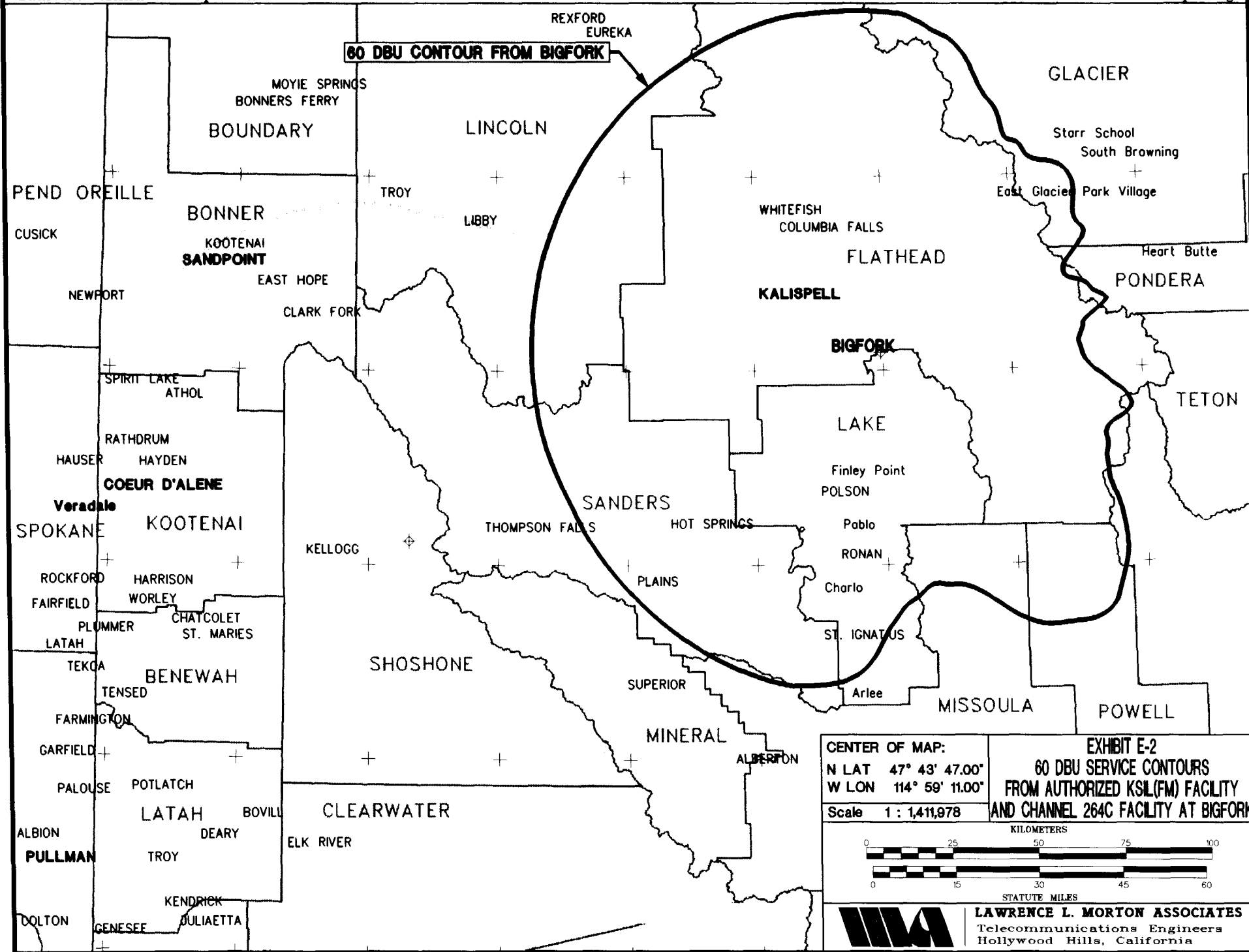
My Commission expires 11/30/99



Notary Public



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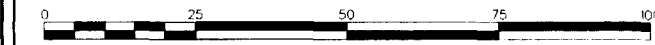
EXHIBIT E-3

KSIL(FM) AUTHORIZED 60 DBU CONTOUR

AT WALLACE, IDAHO

AND OTHER AURAL BROADCAST SERVICES

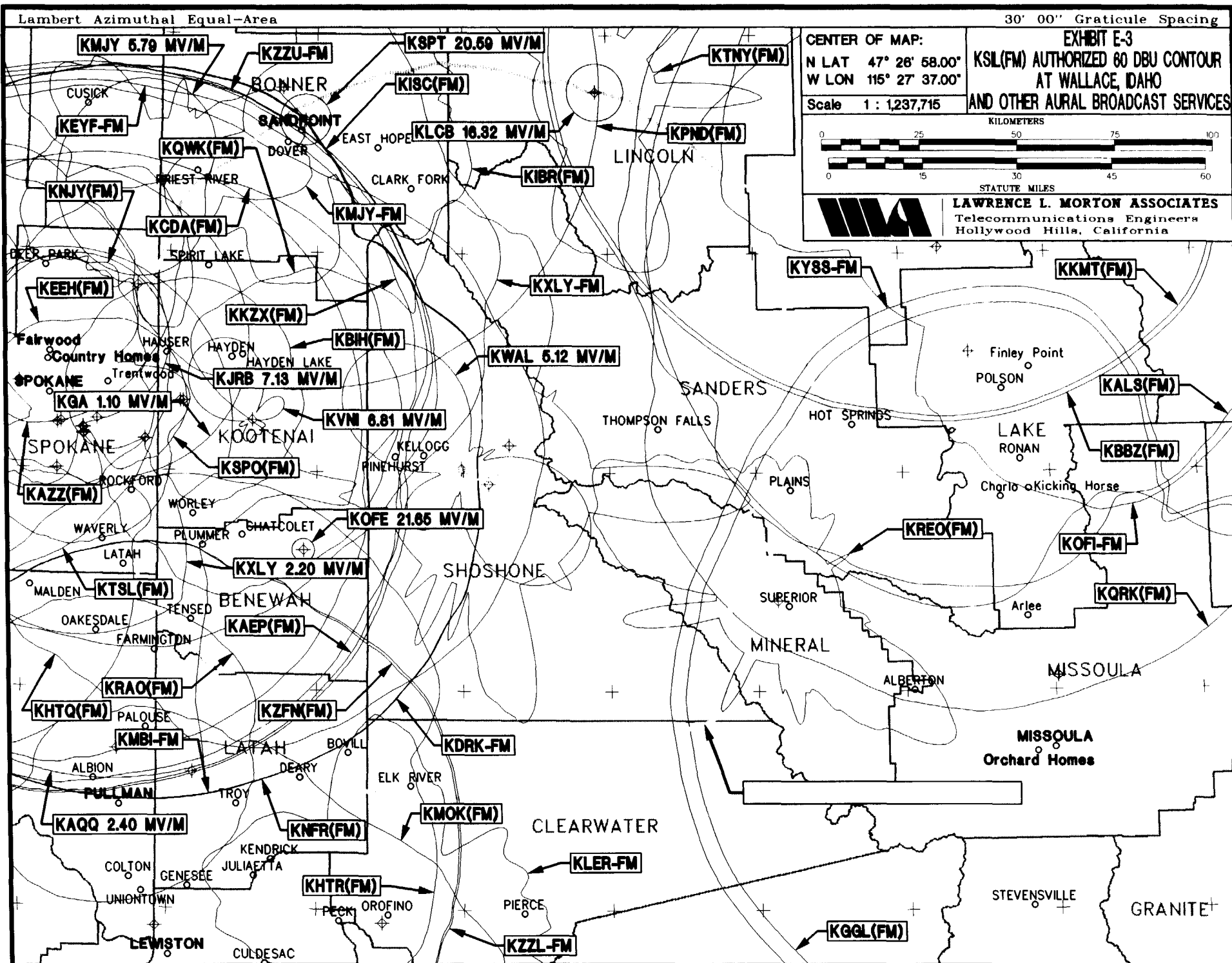
KILOMETERS



STATUTE MILES

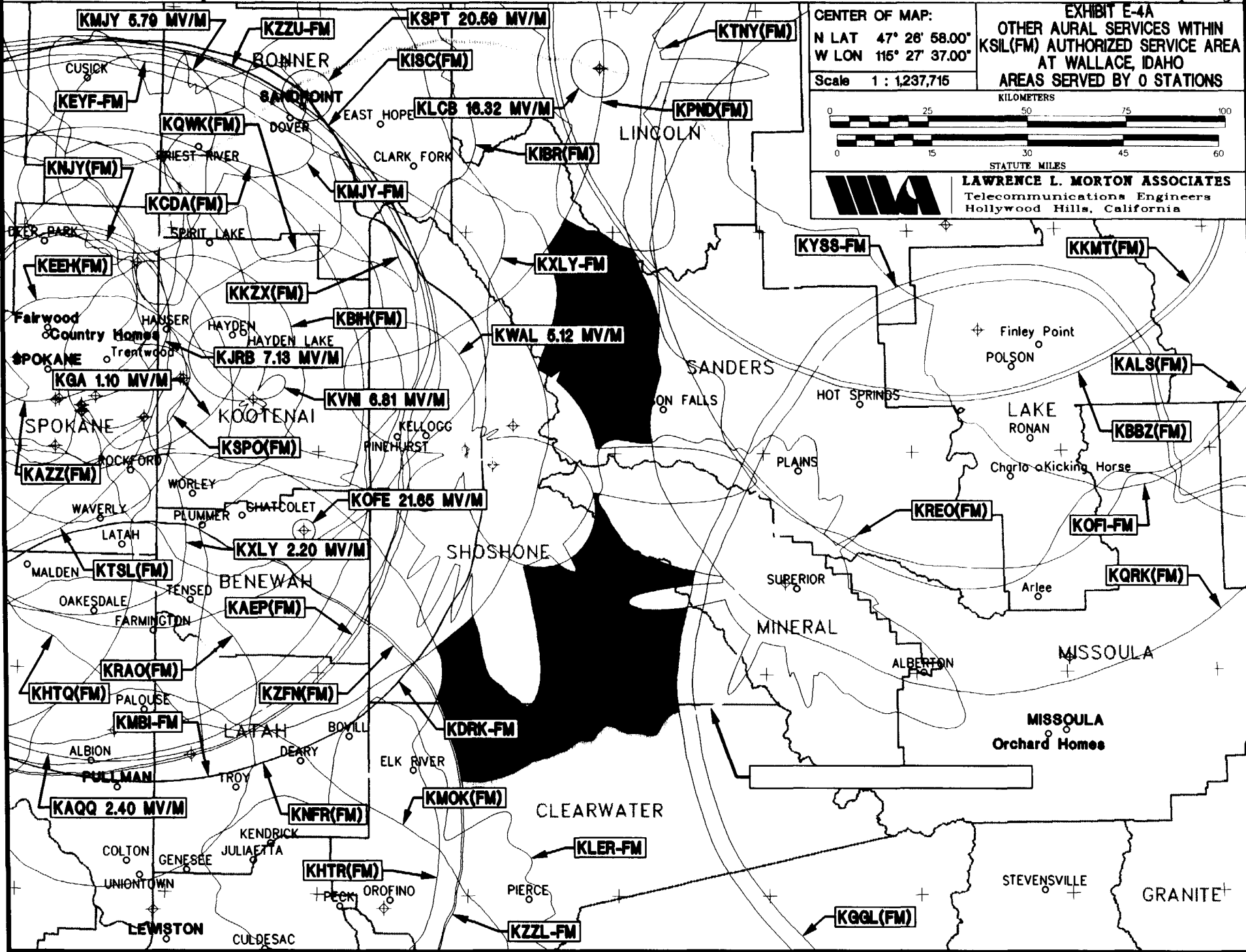


LAWRENCE L. MORTON ASSOCIATES
Telecommunications Engineers
Hollywood Hills, California



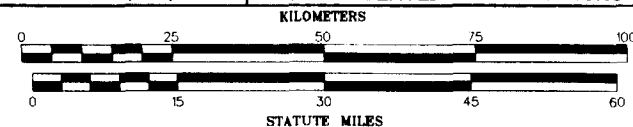
Lambert Azimuthal Equal-Area

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CENTER OF MAP:
N LAT 47° 26' 58.00"
W LON 116° 27' 37.00"
Scale 1 : 1,237,715

EXHIBIT E-4A
OTHER AURAL SERVICES WITHIN
KSIL(FM) AUTHORIZED SERVICE AREA
AT WALLACE, IDAHO
AREAS SERVED BY 0 STATIONS



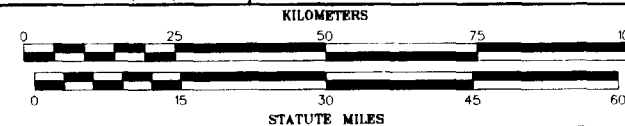
LMA LAWRENCE L. MORTON ASSOCIATES
Telecommunications Engineers
Hollywood Hills, California

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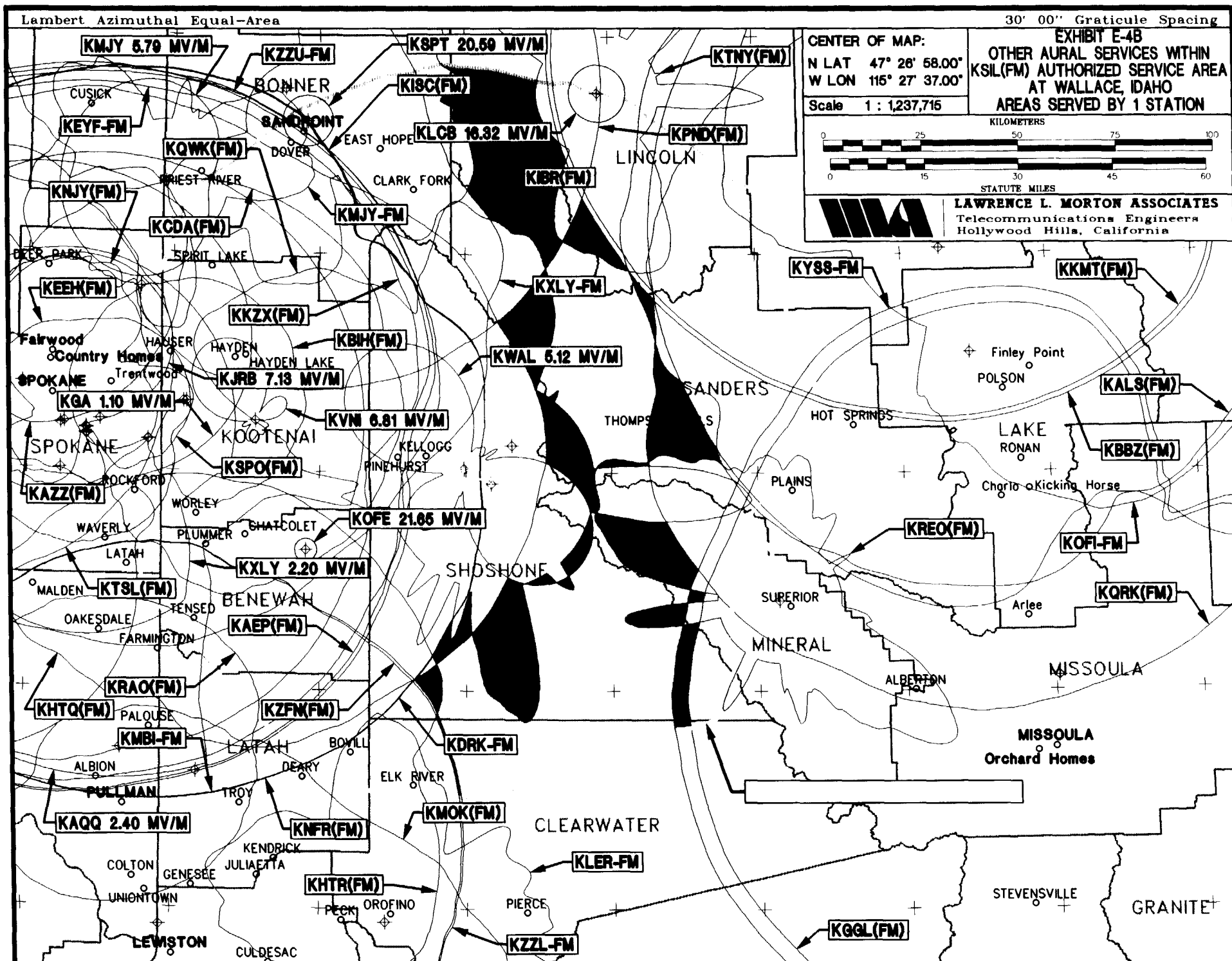
EXHIBIT E-4B

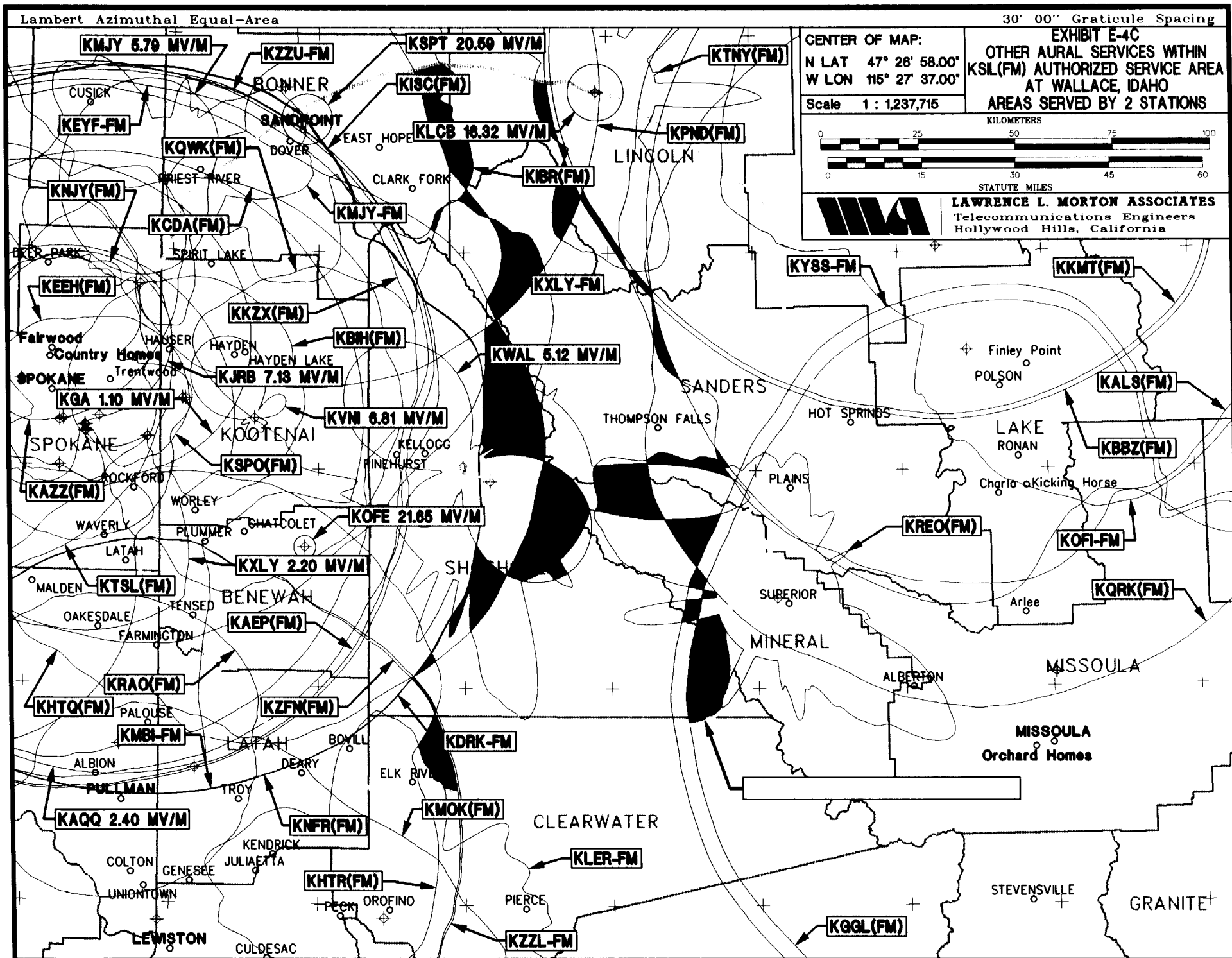
OTHER AURAL SERVICES WITHIN
KSIL(FM) AUTHORIZED SERVICE AREA
AT WALLACE, IDAHO
AREAS SERVED BY 1 STATION

Scale 1 : 1,237,715

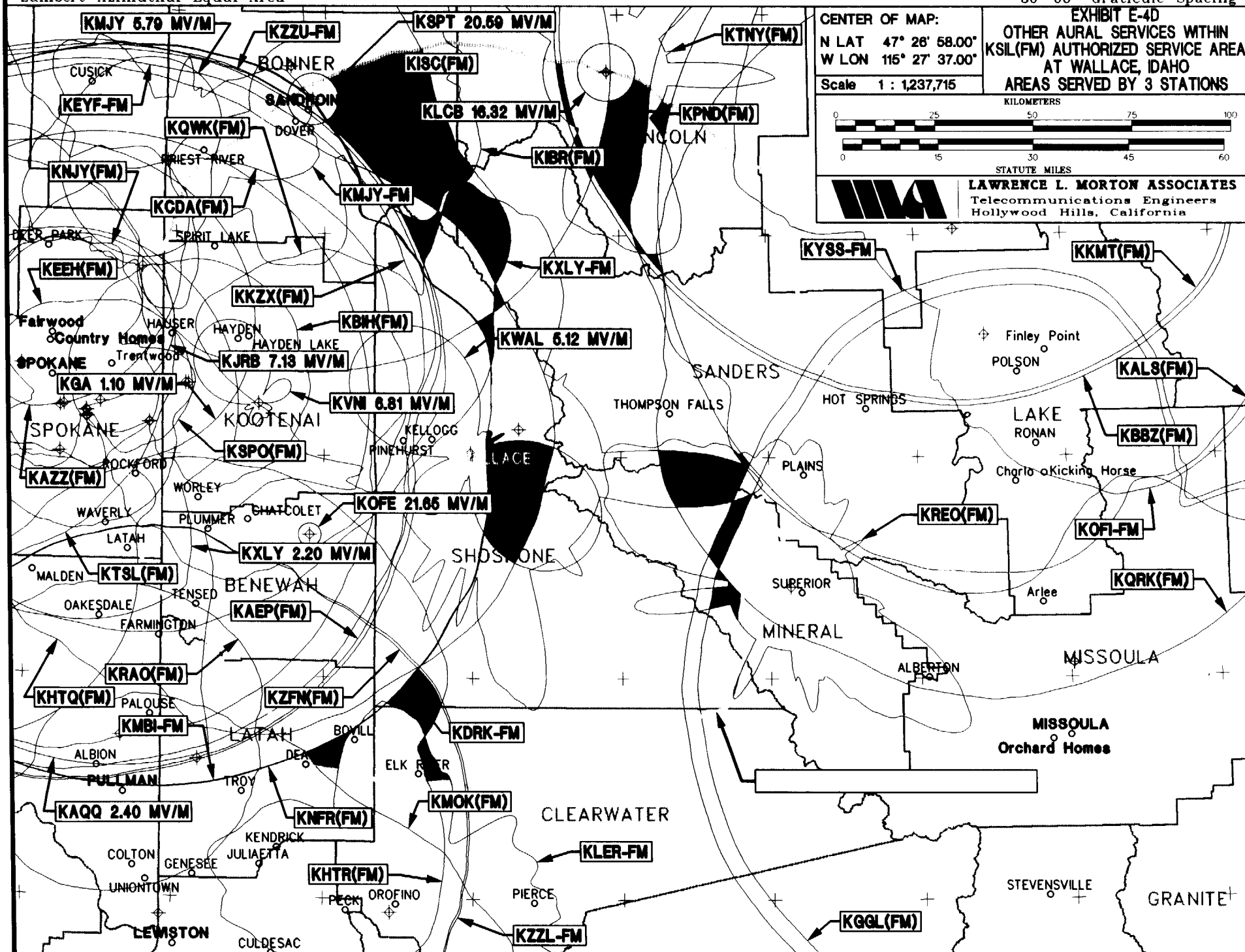


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Hollywood Hills, California





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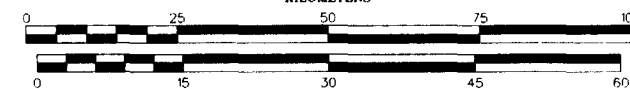
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EXHIBIT E-4E

OTHER AURAL SERVICES WITHIN
KSIL(FM) AUTHORIZED SERVICE AREA
AT WALLACE, IDAHO
AREAS SERVED BY 4 STATIONS

Scale 1 : 1,237,715

KILOMETERS



STATUTE MILES



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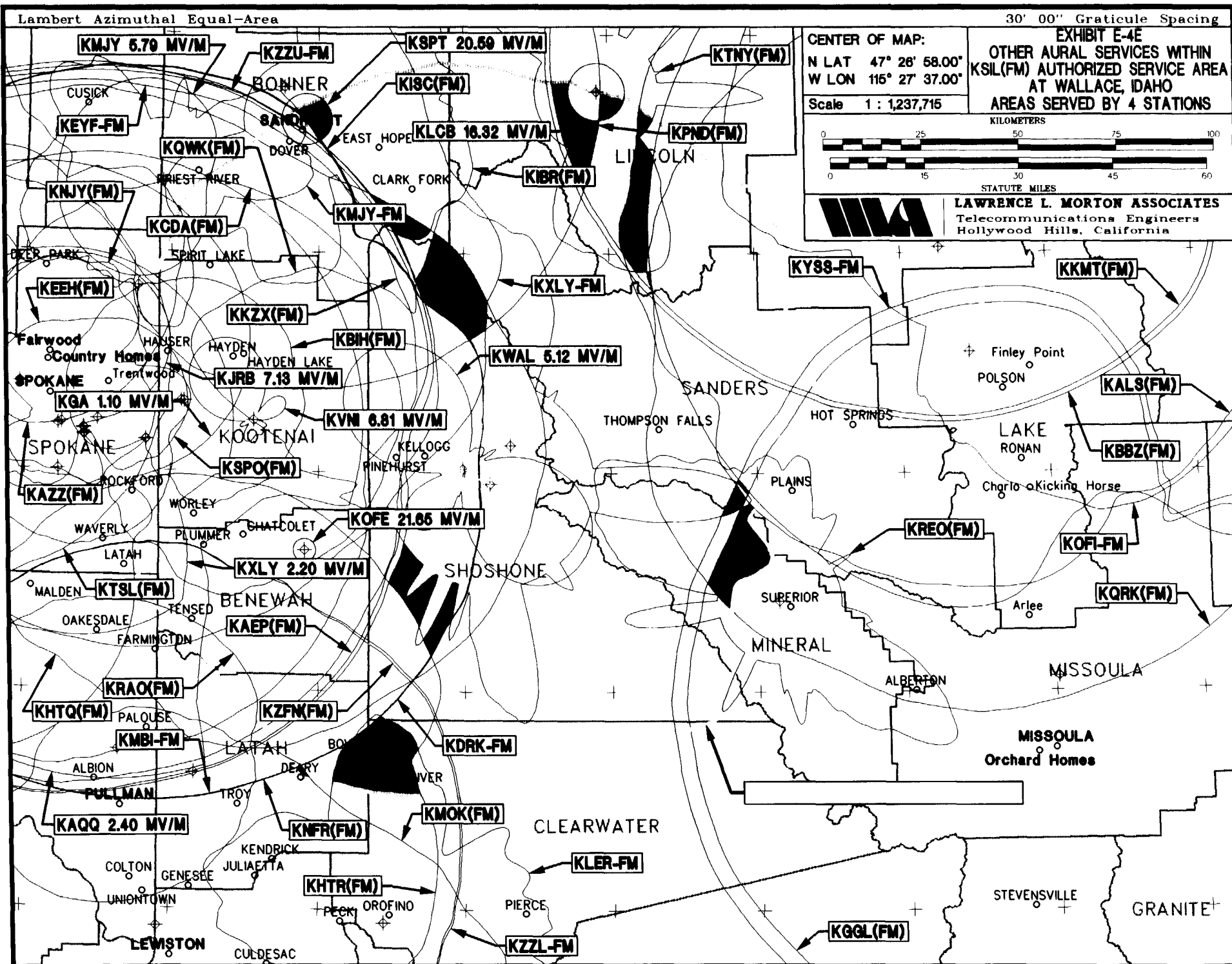


EXHIBIT E-5
OTHER AURAL SERVICES WITHIN KSIL(FM)
PROPOSED LOSS AREA AT WALLACE, IDAHO

Bee Broadcasting, Inc.

November 1998

NUMBER OF STATIONS SERVING THIS AREA	LAND AREA			POPULATION	
	SQUARE KILOMETERS	SQUARE MILES	% OF LOSS AREA	1990 CENSUS POPULATION	% OF LOSS AREA
0	3,517.62	1,358.16	15.19	1,553	1.15
1	2,854.51	1,102.13	12.33	2,705	2.01
2	2,238.73	864.38	9.67	990	0.74
3	2,492.85	962.49	10.76	6,779	5.04
4	1,477.93	570.63	6.38	5,166	3.84
5	695.95	268.71	3.01	933	0.69
6	674.03	260.25	2.91	4,027	2.99
7	734.50	283.59	3.17	2,662	1.98
8	337.05	130.13	1.46	1,133	0.84
9	286.74	110.71	1.24	1,766	1.31
10	504.97	194.97	2.18	5,266	3.91
11	410.11	158.35	1.77	4,002	2.97
12	1,341.26	517.86	5.79	4,223	3.14
13	1,821.17	703.16	7.86	9,144	6.79
14	1,567.36	605.16	6.77	5,271	3.92
15	928.35	358.44	4.01	13,148	9.77
16	530.26	204.73	2.29	28,105	20.88
17	342.55	132.26	1.48	21,491	15.97
18	175.31	67.69	0.76	4,143	3.08
19	134.33	51.86	0.58	6,390	4.75
20	84.26	32.53	0.36	5,305	3.94
21	7.75	2.99	0.03	371	0.28
22	0.00	0.00	0.00	0	0.00
23	0.00	0.00	0.00	0	0.00
24	0.00	0.00	0.00	0	0.00
25+	0.00	0.00	0.00	0	0.00
TOTALS:	23,157.60	8,941.20	100.0 %	134,573	100.0 %

EXHIBIT E-6
STATIONS PROVIDING OTHER AURAL BROADCAST SERVICES
WITHIN KSIL(FM) PROPOSED LOSS AREA

Bee Broadcasting, Inc.

November 1998

NUMBER	CALL LETTERS	CITY	STATE	FREQUENCY
1	KQRK(FM)	RONAN	MT	92.3 MHz
2	KZZU-FM	SPOKANE	WA	92.9
3	KGGL(FM)	MISSOULA	MT	93.3
4	KDRK-FM	SPOKANE	WA	93.7
5	KHTQ(FM)	HAYDEN	ID	94.5
6	KYSS-FM	MISSOULA	MT	94.9
7	KLER-FM	OROFINO	ID	95.3
8	KPND(FM)	SANDPOINT	ID	95.3
9	KKMT(FM)	COLUMBIA FALLS	MT	95.9
10	KNFR(FM)	OPPORTUNITY	WA	96.1
11	KALS(FM)	KALISPELL	MT	97.1
12	KQWK(FM)	WALLACE	ID	97.5
13	KISC(FM)	SPOKANE	WA	98.1
14	KBBZ(FM)	KALISPELL	MT	98.5
15	KKZX(FM)	SPOKANE	WA	98.9
16	KZZL-FM	PULLMAN	WA	99.5
17	KXLY-FM	SPOKANE	WA	99.9
18	BIGFORK	BIGFORK	MT	100.7
19	KEYF-FM	CHENEY	WA	101.1
20	KTNY(FM)	LIBBY	MT	101.7
21	KTSL(FM)	MEDICAL LAKE	WA	101.9
22	KBIH(FM)	COEUR D'ALENE	ID	102.3
23	KIBR(FM)	SANDPOINT	ID	102.5
24	KRAO(FM)	COLFAX	WA	102.5
25	KCDA(FM)	COEUR D'ALENE	ID	103.1
26	KNJY(FM)	SPOKANE	WA	103.9
27	KHTR(FM)	PULLMAN	WA	104.3
28	KEEH(FM)	SPOKANE	WA	104.7
29	KMJY-FM	NEWPORT	WA	104.9
30	KAEP(FM)	SPOKANE	WA	105.7
31	KZFN(FM)	MOSCOW	ID	106.1
32	KSPO(FM)	DISHMAN	WA	106.5
33	KMOK(FM)	LEWISTON	ID	106.9
34	KAZZ(FM)	DEER PARK	WA	107.1

NUMBER	CALL LETTERS	CITY	STATE	FREQUENCY
35	KREQ(FM)	SUPERIOR	MT	107.5
36	KMBI-FM	SPOKANE	WA	107.9
37	KAQQ	SPOKANE	WA	590. kHz
38	KWAL	WALLACE	ID	620
39	KMJY	NEWPORT	WA	700
40	KJRB	SPOKANE	WA	790
41	KXLY	SPOKANE	WA	920
42	KVNI	COEUR D' ALENE	ID	1080
43	KLCB	LIBBY	MT	1230
44	KOFE	ST. MARIES	ID	1240
45	KSPT	SANDPOINT	ID	1400
46	KGA	SPOKANE	WA	1510